

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 0122
v.)	Hon. Harry D. Leinenweber
)	
KEVIN WADDELL)	

**MOTION FOR LEAVE TO FILE ADDITIONAL
PRETRIAL MOTIONS**

Kevin Waddell, defendant herein, by his attorney, Gary Ravitz, seeks leave to submit additional pretrial motions based upon the results of pretrial discovery within a reasonable time after the grounds for such motions have been ascertained. In support of this motion, he states:

1. Discovery provided by the government may lead to information presently unknown to Mr. Waddell, or his counsel, which would provide the basis for action by the Court before trial.
2. Mr. Waddell and numerous other individuals are charged or named in this indictment, alleging a large-scale narcotics conspiracy spanning a period of years. Waddell to date has received voluminous discovery, including extensive wiretap evidence, relating broadly to the charged conspiracy and specifically to defendants other than himself, but anticipates that with time he will be receiving even more evidence.
3. Until Mr. Waddell has reviewed all of the discovery, he cannot say whether a good faith basis exists to file additional motions.

WHEREFORE, Kevin Waddell respectfully seeks leave to submit additional pretrial motions based upon the results of pretrial discovery within a reasonable time after the grounds for such motions have been ascertained.

Respectfully submitted,

s/ Gary Ravitz

Gary Ravitz, attorney for Kevin Waddell

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